

MARK E. FERRARIO
Nevada Bar No. 1625
ferrariom@gtlaw.com
KARA B. HENDRICKS
Nevada Bar No. 7743
hendricksk@gtlaw.com
GREENBERG TRAURIG, LLP
3773 Howard Hughes Parkway, Suite 400 North
Las Vegas, Nevada 89169
Telephone: (702) 792-3773
Fax: (702) 792-9002

*Counsel for Defendant
Clark County School District*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JOHN and JANE DOE I, Guardians Ad Litem
for JOANN DOE I, a minor, individually and on
behalf of all those similarly situated, and JOHN
and JANE DOE II, Guardians Ad Litem for
JOANN DOE II, a minor, individually and on
behalf of all those similarly situated;

Plaintiffs,

vs.

JEREMIAH MAZO; CLARK COUNTY
SCHOOL DISTRICT; DOES 1 through 20;
DOE 1 through 20; ROE CORPORATIONS 1
through 20;

Defendants.

Case No. 2:16-cv-00239-APG-PAL

**[PROPOSED] AMENDED STIPULATION
AND ORDER TO CONTINUE
DISCOVERY**

(Second Request)

The parties have reached an agreement to attend mediation and to delay the limited remaining depositions in this case until after the mediation has taken place. In light of this agreement, Plaintiffs, JOHN and JANE DOE I, GUARDIANS AD LITEM FOR JOANN DOE I, A MINOR AND JOHN AND JANE DOE II, GUARDIANS AD LITEM FOR JOANN DOE II, A MINOR (collectively, "Plaintiffs"), Defendant CLARK COUNTY SCHOOL DISTRICT ("CCSD")

1 and Defendant JEREMIAH MAZO, by and through their respective counsel of record, hereby
2 jointly submit this proposed amended stipulation extending certain case deadlines for the approval
3 of the Court.¹

4 **STIPULATION**

5 Pursuant to Local Rule 6-1, IT IS HEREBY STIPULATED AND AGREED by and between
6 Plaintiffs, CCSD, and Jeremiah Mazo that the current deadlines be extended in the above referenced
7 matter.

8 The current deadlines are as follows:

9 Discovery Cut-Off Date: January 29, 2018

10 Dispositive Motions: February 28, 2018

11 Proposed Joint Pretrial Order: March 28, 2018 or 30 days after
12 the Court rules on any
13 dispositive motions.

14 **I. Background**

15 This case was filed on February 5, 2016, alleging abuse of students by a former CCSD
16 teacher, Jeremiah Mazo, and bringing claims under Title IX against CCSD and state tort claims
17 against all defendants. (Doc. 1). Plaintiffs filed a First Amended Class Action Complaint on March
18 1, 2017. (Doc. 39). CCSD filed its Answer to the First Amended Class Action Complaint on March
19 16, 2017, and asserted cross-claims against Defendant Mr. Mazo. (Doc. 43). Mr. Mazo filed an
20 Answer to the Plaintiffs' First Amended Class Action Complaint on June 2, 2017 and his answer to
21 CCSD's Cross-Claims on July 6, 2017 (Doc. Nos. 61, 67).

22 **II. Discovery Completed**

23 **Plaintiffs have served Defendant Clark County School District with the following**
24 **discovery to date:**

- 25 1. Plaintiffs' Early Case Conference List of Documents and Witnesses Pursuant to
26 FRCP 26(F) served 10/10/2016;

27 ¹ The Parties submitted a stipulation to the Court in this regard on December 28, 2017 (Doc. 72) and are submitting this
28 amendment due to the scheduling of the mediation for March 29, 2018 and basing the proposed new deadlines on the
same.

- 1 2. Plaintiffs John and Jane Doe I, Guardians ad Litem for Joann Doe I, and John and
- 2 Jane Doe II, Guardians ad Litem for Joann Doe II's First set of Request of
- 3 Production of Documents served 10/27/16;
- 4 3. Plaintiffs' First Supplement to Early Case Conference List of Documents and
- 5 Witnesses Pursuant to FRCP 26(F) served 12/14/2016;
- 6 4. Plaintiff Jane Doe I as Guardian ad Litem for Joann Doe I's Responses to Clark
- 7 County School District's First set of Interrogatories served 12/14/2016;
- 8 5. Plaintiff Joann Doe I's Responses to Clark County School District's First set of
- 9 Interrogatories served 12/14/2016;
- 10 6. Plaintiff John Doe I as Guardian ad Litem for Joann Doe I's Responses to Clark
- 11 County School District's First set of Interrogatories served 12/14/2016;
- 12 7. Plaintiffs John and Jane Doe I as Guardians ad Litem for Joann Doe I's Responses to
- 13 Clark County School District's First set of Request for Production of Documents
- 14 served 12/14/2016;
- 15 8. Plaintiff Jane Doe II as Guardian ad Litem for Joann Doe II's Responses to Clark
- 16 County School District's First set of Interrogatories served 12/14/2016;
- 17 9. Plaintiff Joann Doe II's Responses to Clark County School District's First set of
- 18 Interrogatories served 12/14/2016;
- 19 10. Plaintiff John Doe II as Guardian ad Litem for Joann Doe II's Responses to Clark
- 20 County School District's First set of Interrogatories served 12/14/2016;
- 21 11. Plaintiffs John and Jane Doe II as Guardians ad Litem for Joann Doe II's Responses
- 22 to Clark County School District's First set of Request for Production of Documents
- 23 served 12/14/2016;
- 24 12. Plaintiffs John and Jane Doe I, Guardians ad Litem for Joann Doe I, and John and
- 25 Jane Doe II, Guardians ad Litem for Joann Doe II's Second set of Requests for
- 26 Production of Documents served 01/18/2017;
- 27 13. Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of
- 28 Requests for Admission served 01/18/2017;

- 1 14. Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of
- 2 Interrogatories served 01/18/2017;
- 3 15. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of
- 4 Interrogatories served 01/18/2017;
- 5 16. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of
- 6 Requests for Admission served 01/18/2017;
- 7 17. Plaintiffs John and Jane Doe I, Guardians ad Litem for Joann Doe I, and John and
- 8 Jane Doe II, Guardians ad Litem for Joann Doe II's Third set of Requests for
- 9 Production of Documents served 01/20/2017;
- 10 18. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a minor's Second set of
- 11 Interrogatories served 01/23/2017;
- 12 19. Plaintiffs' Second Supplement to Early Case Conference List of Documents and
- 13 Witnesses Pursuant to FRCP 26(F) served 02/10/17;
- 14 20. Plaintiff Joann Doe II's Supplemental Responses to CCSD's First set of
- 15 Interrogatories served on 03/01/17;
- 16 21. Plaintiff Joann Doe I's Supplemental Responses to CCSD's First set of
- 17 Interrogatories served on 03/01/17;
- 18 22. Plaintiffs' Third Supplement to Early Case Conference List of Documents and
- 19 Witnesses Pursuant to FRCP 26(F) served 05/31/17;
- 20 23. Plaintiffs' Fourth Supplement to Early Case Conference List of Documents and
- 21 Witnesses Pursuant to FRCP 26(F) served 07/07/17;
- 22 24. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a Minor's Third Set of
- 23 Interrogatories to CCSD served 07/11/17;
- 24 25. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a Minor's Fourth Set of
- 25 Interrogatories to CCSD served 08/22/17;
- 26 26. Plaintiffs' Fifth Supplement to Early Case Conference List of Documents and
- 27 Witnesses Pursuant to FRCP 26(F) served 10/11/17;
- 28 27. Plaintiffs' Expert Designation Pursuant to FRCP 26(A)(2) served 10/13/17.

**Defendant Clark County School District has served Plaintiffs with the following
discovery to date:**

1. CCSD's Initial Disclosures served 10/05/2016;
2. CCSD's First set of Interrogatories to Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I served 11/14/2016;
3. CCSD's First set of Interrogatories to Plaintiff Joann Doe I served 11/14/2016;
4. CCSD's First set of Interrogatories to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I served 11/14/2016;
5. CCSD's First set of Requests for Production of Documents to Plaintiffs John and Jane Doe I, as Guardians ad Litem for Joann Doe I served 11/14/2016;
6. CCSD's First set of Interrogatories to Plaintiff Jane Doe II, as Guardian ad Litem for Joann Doe II served 11/14/2016;
7. CCSD's First set of Interrogatories to Plaintiff Joann Doe II served 11/14/2016;
8. CCSD's First set of Interrogatories to Plaintiff John Doe II, as Guardian ad Litem for Joann Doe II served 11/14/2016;
9. CCSD's First set of Requests for Production of Documents to Plaintiffs John and Jane Doe II, as Guardians ad Litem for Joann Doe II served 11/14/2016;
10. CCSD's Responses to Plaintiffs' First set of Requests for Production of Documents to the Clark County School District served 12/01/2016;
11. CCSD's First Supplemental Disclosures served 12/01/2016;
12. CCSD's Second Supplemental Disclosures served 02/17/17;
13. CCSD's Third Supplemental Disclosures served 02/24/17;
14. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a Minor's First Set of Requests for Admission to CCSD served 02/24/17;
15. CCSD's Responses to Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a Minor's First Set of Requests for Admission to CCSD served 02/24/17;
16. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a Minor's First set of Interrogatories to CCSD served 02/27/17;

- 1 17. CCSD's Responses to Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a
- 2 Minor's First set of Interrogatories to CCSD served 02/27/17;
- 3 18. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a
- 4 Minor's Second set of Interrogatories to CCSD served 03/10/17;
- 5 19. CCSD's Fourth Supplemental Disclosures Pursuant to FRCP 26(a)(1) and Pursuant
- 6 to March 6, 2017 Order served 04/05/17;
- 7 20. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a
- 8 Minor's Third set of Interrogatories to CCSD served 07/24/17;
- 9 21. CCSD's Fourth Supplemental Disclosures served 08/21/17;
- 10 22. CCSD's Responses to Plaintiff Jon Doe I, as Guardian ad Litem for Joann Doe I, a
- 11 Minor's Fourth set of Interrogatories to CCSD served 09/21/17;
- 12 23. CCSD's Sixth Supplemental Disclosures served 09/01/2017;
- 13 24. CCSD's Seventh Supplemental Disclosures served 10/13/17;
- 14 25. CCSD's Expert Witness Disclosures served 10/13/17.

15 **The following depositions have been completed to date:**

- 16 1. Ulandra Barnett
- 17 2. Ivy Burns
- 18 3. Sylvia Glass
- 19 4. Jennifer Mattiello
- 20 5. Nestor Mattiello
- 21 6. Jon Okazaki
- 22 7. Julia Pettit
- 23 8. Kristopher Pettit
- 24 9. Christine Prosen
- 25 10. Darrin Puana
- 26 11. Billie Rayford

27 **III. Discovery That Remains to be Completed**

- 28 1. Deposition of Defendant Jeremy Mazo;

2. Depositions of Plaintiffs Joann Doe I and Joann Doe II;² and

3. Expert Depositions.

IV. Basis for Extension

The parties request this extension to allow the depositions of Joann Doe I, Joann Doe II, Jeremy Mazo, and the parties' expert witnesses to take place after a mediation, which the parties have scheduled for March 29, 2018 with Bongiovi Dispute Resolutions, LLC. The parties have diligently engaged in discovery and believe that allowing these final depositions to take place following the mediation will further mediation discussions. Accordingly, the parties request an extension to allow for the foregoing outstanding discovery to be completed after the anticipated completion of mediation which is scheduled for March 29, 2018 as detailed below.

V. Proposed Modification

Based on the foregoing, the parties jointly seek a modification of the current deadlines as follows:

1. **Current Deadlines:**

Discovery Cut-Off Date:

January 29, 2018

Dispositive Motions:

February 28, 2018

Proposed Joint Pretrial Order:

**March 28, 2018 or 30 days
after the Court rules on any
dispositive motions.**

2. **Proposed Deadlines:**

Discovery Cut-Off Date:

May 29, 2018

Dispositive Motions:

June 28, 2018

Proposed Joint Pretrial Order:

**July 31, 2018 or 30 days after
the Court rules on any
dispositive motions.**

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² Defendants have expressed a desire to conduct the depositions of Joann Doe I and Joann Doe II, who are both minors. Plaintiffs hereby reserve the right to object to such depositions from going forward.

3. This request is made in good faith and not for the purposes of delay.

IT IS SO STIPULATED.

Dated this 22nd day of February, 2018.

GREENBERG TRAURIG, LLP

/s/ Kara B. Hendricks

MARK E. FERRARIO, ESQ. (NV BAR 1625)
KARA B. HENDRICKS, ESQ. (NV BAR 7743)
3773 Howard Hughes Parkway
Suite 400 North
Las Vegas, Nevada 89169
*Attorneys for Defendant Clark County
School District*

Dated this 22nd day of February, 2018.

EGLET PRINCE

/s/ Artemus W. Ham

ROBERT T. EGLET, ESQ. (NV BAR 3402)
ARTEMUS W. HAM, ESQ. (NV BAR 7001)
AARON D. FORD, ESQ. (NV BAR 7704)
400 S. 7th Street, 4th Floor
Las Vegas, Nevada 89101
Attorneys for Plaintiffs

Dated this 22nd day of February, 2018.

HALL JAFFE & CLAYTON, LLP

/s/ Michelle R. Schwarz

STEVEN T. JAFFE, ESQ. (NV BAR 7035)
MICHELLE R. SCHWARZ, ESQ. (NV BAR 5127)
7425 Peak Drive
Las Vegas, Nevada 89128
*Attorneys for Defendant Clark County
School District*

Dated this 22nd day of February, 2018.

JOHN G. GEORGE, ESQ.

/s/ John G. George

JOHN G. GEORGE, ESQ. (NV BAR 12380)
732 South Sixth Street, Suite 100
Las Vegas, Nevada 89101
Counsel for Defendant Jeremiah Mazo

ORDER

IT IS HEREBY ORDERED.

DATED this 23rd day of February, 2018.


UNITED STATES MAGISTRATE JUDGE